

# **EXHIBIT 2**

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April 3, 2007

**VIA E-MAIL AND U.S. MAIL**

Frank E. Merideth, Jr., Esquire  
Greenberg Traurig LLP  
2450 Colorado Avenue  
Suite 400E  
Santa Monica, CA 90404  
MeridethF@GTLAW.com

**Re: *LG.Philips LCD Co., Ltd. v. ViewSonic Corporation, et al.*;  
U.S. District Court Case No. 04-343 JJF**

Dear Frank:

We are responding to your March 29, 2007 letter concerning the draft declaration of Ms. Rebecca Rudich. We are responding on behalf of Lora Brzezynski, who is on vacation but will return to the office later in the week.

We have completed our initial review of your draft declaration for Ms. Rudich, but are still investigating certain other factual issues, which will require additional time to complete.

At this point in time, however, we provide the following comments and observations. McKenna Long & Aldridge is not in possession of an IBM 9516 monitor. Moreover, Ms. Rudich's June 19, 2006 response to the December 19, 2006 Office Action relied on the photographs contained in the April 1, 2005 Information Disclosure Statement ("IDS"), not an inspection of an actual IBM 9516 monitor. Ms. Rudich never performed an inspection of an actual IBM 9516.

From our review of the draft declaration, we take issue with the following Paragraphs for the reasons stated below:

- i) Paragraph 6 - it states Ms. Rudich inspected an actual device;
- ii) Paragraph 7 - it references photographs that Ms. Rudich has no knowledge of, and therefore cannot attest to the content or accuracy of;

Frank E. Merideth, Jr., Esquire  
April 3, 2007  
Page 2

iii) Paragraph 9 - it alludes to an actual inspection of an IBM 9516;

iv) Paragraph 10 - it references photographs that Ms. Rudich has no knowledge of and therefore cannot attest to the content or accuracy of;

v) Paragraph 11 - it attempts to have Ms. Rudich make comparisons to photographs that Ms. Rudich has no knowledge of and therefore cannot attest to the content or accuracy of;

vi) Paragraph 12 - it implies that Ms. Rudich conducted the disassembly of the IBM 9516;

vii) Paragraph 13 - it attempts to have Ms. Rudich make comparisons to photographs that Ms. Rudich has no knowledge of and therefore cannot attest to the content or accuracy of; and

viii) Paragraph 14 - it attempts to have Ms. Rudich make comparisons to photographs that Ms. Rudich has no knowledge of and therefore cannot attest to the content or accuracy of.

On a related note, we find it troubling that Steve Hassid's March 27th letter asked for an inspection of the IBM 9516 supposedly in our possession, when we note from Scott Miller's March 28, 2007 letter that Defendants have not one but two of these monitors already in their possession. We assume this is where the photographs attached at Exhibits D, E, H and I to the draft declaration originated from, given they are dated March 13, 2007.

As you can discern from the above comments, Ms. Rudich can not opine on any subject other than the content of the June 19, 2006 Response. Ms. Rudich has no other information because she has not seen an actual IBM 9516. Thus, any further testimony would be in the nature of expert opinion and potentially work product and would not be permissible or appropriate.

Accordingly, we believe it may be more productive for all parties to conduct a conference call regarding this draft declaration. Such a call would allow us to determine what information you are trying to elicit, and would allow us to aid in the drafting of such statements, and thereby allow for a much quicker resolution to this issue.

Frank E. Merideth, Jr., Esquire  
April 3, 2007  
Page 3

We look forward to hearing from you to schedule such a call.

Sincerely,



Rel S. Ambrozy

RSA:mrs

cc: Tracy R. Roman (via email)  
Scott R. Miller (via email)  
Mark H. Krietzman (via email)  
Valerie W. Ho (via email)  
Jong P. Hong (via email)  
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